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September 13, 2024

VIA ECF

Hon. Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: Karyn Blumstein-Torrella v. New York City Department of Education, et al.
1:19-cv-03492-ALC

Dear Judge Carter:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and attorney for Defendants in the above-referenced action. I submit this joint letter on behalf of Plaintiff and Defendants, in accordance with Your Honor's Individual Rules, to respectfully request a 25-day extension of time, from September 23, 2024 to October 18, 2024, for the parties to file objections to the Report and Recommendation of United States Magistrate Judge Valerie Figueredo. See ECF Dkt. No. 51. This is the first request for an extension of this deadline and no other case deadlines will be impacted by this request.

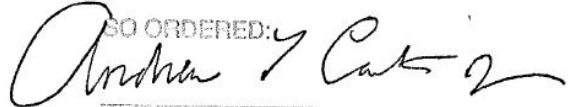
The parties submit this request because the undersigned is appearing in a jury trial for Hanley v. New York City Health and Hospitals Corp., No. 1:19-cv-04246, which was scheduled to commence before Judge Frederic Block in the Eastern District of New York on September 16, 2024, and on September 11, 2024 was adjourned to October 21, 2024 because the Court had a scheduling conflict. A second pre-trial conference is scheduled for September 18, 2024. The trial is expected to last approximately five to eight business days. The trial has also required, and will continue to require, a substantial number of hours of preparation until the trial is completed. In addition, the undersigned will be observing multiple Jewish holidays throughout October. Accordingly, the parties require the additional time to adequately respond to the Report and Recommendation, which is 40 pages.

The parties thank the Court for its consideration of their request.

Respectfully submitted,

/s/ Hayley N. Bronner
Hayley N. Bronner
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)

SO ORDERED: 
HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
September 13, 2024
New York, New York